

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION**

JEREMY HUFFMAN, SR.,)	
)	
Plaintiff,)	
)	
v.)	Cause No. 3:19-cv-169
)	
ST. JOSEPH COUNTY, et al)	
)	
Defendants.)	

FIRST SET OF INTERROGATORIES TO PLAINTIFF

Defendants, Head Nurse Lynn, Nurse Jason, Dr. Tieman and Dr. Hall (hereinafter collectively “Defendants”), by counsel, propound the following interrogatories to Plaintiff.

Federal Rule 33 requires that within thirty (30) days you provide full, separate and written answers under oath to each of the following interrogatories. Trial Rule 33(A) requires that you provide all information that is available to you.

You must supplement or amend your answers in the future as required by Federal Rule 26(E).

According to Federal Rule 33(E), any answer which refers to a record must specify the record in sufficient detail to permit us to locate and identify it as readily as you could.

DEFINITIONS

1. “Person” means the plural as well as the singular, and includes any natural person, governmental unit or entity, partnership, firm, corporation, association, joint venture, or any other form of business organization, arrangement, or legal entity.

2. “Document” means the original and each nonidentical copy of any written, typed, printed, recorded, photographic or graphic matter, including, without limitation, letters,

memoranda, telegrams, handwritten notes, periodicals, pamphlets, reports, records, including medical and hospital records, audits, minutes, studies, logs, working papers, diaries, contracts, agreements, understandings, charts, checks, receipts, estimates, bills, invoices, payments, graphs, indices, lists, data sheets, drawings, calculations, test results, computer programs, or any other physical object, however produced or reproduced, now or formerly in the possession, custody or control of Plaintiff(s).

3. “Identify” when referring to a document means to state its date, title or subject matter, brief description (such as letter, memorandum, notes, etc.), author, addressee, recipient, and present location, and custodian.

4. “Identify” when referring to a person means to state the correct name and address of the person about whom the information is sought, their present or last-known employer, their title or office, and nature and dates of affiliation, if any, with Plaintiff(s).

5. “Identify” when referring to you, the Plaintiff, means your complete name, each of your addresses for the last ten (10) years, your social security number, your date of birth, and occupations and employers for the last ten (10) years, and if pertinent, your maiden name and any previous married name.

6. “Incident” means the event or events which gave rise to your claim for damages.

7. “Specify” means to state explicitly, exactly and unambiguously.

INTERROGATORIES

INTERROGATORY NO. 1: Please state your full name.

ANSWER:

INTERROGATORY NO. 2: Please identify each and every written grievance and/or complaint (formal or informal) you filed at the St. Joseph County Jail regarding the care provided by Head Nurse Lynn, including but not limited to:

- A. The date you filed the grievance;
- B. The statements made in each grievance;
- C. Whom the grievance was filed against;
- D. To whom you submitted the grievance; and
- E. The form of response you received for each grievance and from whom the response was received from.

ANSWER:

INTERROGATORY NO. 3: Please identify each and every written grievance and/or complaint (formal or informal) you filed at the St. Joseph County Jail regarding the care provided by Nurse Jason, including but not limited to:

- A. The date you filed the grievance;
- B. The statements made in each grievance;
- C. Whom the grievance was filed against;
- D. To whom you submitted the grievance; and
- E. The form of response you received for each grievance and from whom the response was received from.

ANSWER:

INTERROGATORY NO. 4: Please identify each and every written grievance and/or complaint (formal or informal) you filed at the St. Joseph County Jail regarding the care provided by Dr.

Tieman, including but not limited to:

- A. The date you filed the grievance;
- B. The statements made in each grievance;
- C. Whom the grievance was filed against;
- D. To whom you submitted the grievance; and
- E. The form of response you received for each grievance and from whom the response was received from.

ANSWER:

INTERROGATORY NO. 5: Please identify each and every written grievance and/or complaint (formal or informal) you filed at the St. Joseph County Jail regarding the care provided by Dr.

Hall, including but not limited to:

- A. The date you filed the grievance;
- B. The statements made in each grievance;
- C. Whom the grievance was filed against;
- D. To whom you submitted the grievance; and
- E. The form of response you received for each grievance and from whom the response was received from.

ANSWER:

INTERROGATORY NO. 6: Please identify any other administrative remedy you sought at the St. Joseph County Jail regarding the care provided by Head Nurse Lynn, including but not limited to the date you sought the administrative remedy and the statements made in each.

ANSWER:

INTERROGATORY NO. 7: Please identify any other administrative remedy you sought at the St. Joseph County Jail regarding the care provided by Nurse Jason, including but not limited to the date you sought the administrative remedy and the statements made in each.

ANSWER:

INTERROGATORY NO. 8: Please identify any other administrative remedy you sought at the St. Joseph County Jail regarding the care provided by Dr. Tieman, including but not limited to the date you sought the administrative remedy and the statements made in each.

ANSWER:

INTERROGATORY NO. 6: Please identify any other administrative remedy you sought at the St. Joseph County Jail regarding the care provided by Dr. Hall, including but not limited to the date you sought the administrative remedy and the statements made in each.

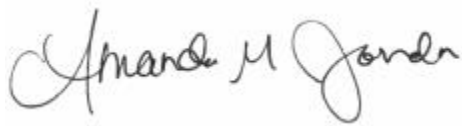
ANSWER:

I affirm under the penalties for perjury the foregoing answers are true, complete and accurate.

Date: _____, 2021

Jeremy Huffman, Sr.

Interrogatories propounded by:



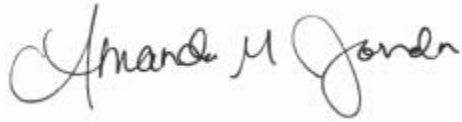
Georgianne M. Walker (23182-71)
Amanda M. Jordan (32129-71)
Attorneys for Defendants

MAY • OBERFELL • LORBER
4100 Edison Lakes Parkway, Suite 100
Mishawaka, IN 46545
Telephone: (574) 243-4100
Facsimile: (574) 232-9789

CERTIFICATE OF SERVICE

I certify that service of the above document was made on February __, 2021 by U.S. certified mail, return receipt requested, postage affixed upon the following:

Jeremy Huffman, Sr.
16508-027
Beckley FCI
Federal Correction Institution
Inmate Mail/Parcels
P O Box 350
Beaver, WV 25813
Certified Mail #
Return Receipt Requested

A handwritten signature in black ink, reading "Amanda M. Jordan". The signature is fluid and cursive, with the first name "Amanda" being more prominent than the middle initial "M" and the last name "Jordan".

Amanda Jordan (32129-71)